

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF
CARPENTERS PENSION FUND, et al.,

Plaintiffs,

V.

REED MACHINERY & TRANSPORTATION
COMPANY, INC.,

Defendant.

Case No. 08 C 1054

Judge Gottschall

Magistrate Judge Schenkier

SWORN DECLARATION PURSUANT TO 28 U.S.C.A. § 1746

Raymond J. Sanguinetti declares as follows:

1. I am an associate of the law firm of Whitfield & McGann and am licensed to practice law in the State of Illinois and in the U.S. Dist. Court for Northern District of Illinois, Eastern Division.
2. I have personal knowledge of the facts stated herein and if called to testify in this matter, I can competently testify to such facts from my own such knowledge.
3. I have in excess of 10 years experience representing trustees of employee benefit plans, including the prosecution of Federal Court litigation to compel compliance with the bonding provisions of the collective bargaining agreement and to collect delinquent employer contributions.
4. Defendant is obligated to pay the attorney fees and court costs incurred by the Plaintiffs pursuant to 29 U.S.C. §1132(g)(1).
5. I have devoted 7.00 hours in connection with this case at the rate of \$165.00 per hour. The total attorney fees billings is \$1,155.00. (See Attached Bill Slips)

6. In addition, the filing fee was \$350.00 and the fee for service of process was an additional \$55.00. These costs total \$405.00.

7. I certify that the attached detailed attorney fees and costs totaling \$1,560.00 were necessary and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

Date: April 30, 2008

s/ RAYMOND J. SANGUINETTI

Attorney for the Chicago Regional
Council of Carpenters Pension Fund, et
al.

4/30/2008
2:14 PMWHITFIELD, McGANN & KETTERMAN
Slip Listing

Page 1

Selection Criteria

Case (hand select) Include: CBOND.N7551/19138
Slip Classification Open

Rate Value and Slip Value hidden by Security Rights
Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
349364	TIME			RJS	1.00		
	11/7/2007			Billable	0.00	T@12	
	Billed	G:72400	12/3/2007	CBOND.N7551/19138	0.00		
			Review bond referral. Research Illinois Secretary of State records for corporate information. Prepared bond demand letter. Prepared updates on bond cases for Daniel McNally and Robert Lid. Diary for suit.		0.00		
349574	TIME			RJS	1.75		
	11/20/2007			Billable	0.00	T@12	
	Billed	G:72400	12/3/2007	CBOND.N7551/19138	0.00		
			Prepared Federal Civil suit for wage and fringe benefit bond; Prepared exhibits; Prepared Federal Summons; Prepared civil cover sheet and appearance; Letter to legal process server.		0.00		
349583	TIME			RJS	0.50		
	11/21/2007			Billable	0.00	T@12	
	Billed	G:72400	12/3/2007	CBOND.N7551/19138	0.00		
			Prepared letter to Robert Lid regarding case status and filing of complaint.		0.00		
350516	TIME			CPW	0.25		
	11/7/2007			Lexis	0.00	A@1	
	Billed	G:72400	12/3/2007	CBOND.N7551/19138	0.00		
			Computer Research Fees/CD ROM		0.00		
353666	TIME			RJS	1.50		
	2/25/2008			Billable	0.00	T@12	
	Billed	G:72945	3/3/2008	CBOND.N7551/19138	0.00		
			Prepared motion for default judgment; Prepared notice of motion; Prepared certificate of service; Prepared exhibits; Prepared affidavit of attorney fees; Prepared draft order.		0.00		
353669	TIME			RJS	1.00		
	2/25/2008			Billable	0.00	T@12	
	Billed	G:72945	3/3/2008	CBOND.N7551/19138	0.00		
			Prepared affidavit of Robert Lid in support of		0.00		

4/30/2008
2:14 PMWHITFIELD, McGANN & KETTERMAN
Slip Listing

Page

2

Slip ID		ATTORNEY	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Case	Est. Time	Bill Status	
Description		Reference	Variance		
prove up. Prepared letter to Robert Lid					
regarding same.					
354743	EXP	CPW	1	350.00	350.00
3/17/2008		\$DC			
Billed	G:73142	4/2/2008	CBOND.N7551/19138		
FILING FEE 2/20/08					
357082	TIME	RJS	1.00		
4/30/2008		Billable	0.00	T@12	
WIP		CBOND.N7551/19138	0.00		
Court Appearance			0.00		
357087	TIME	RJS	1.75		
4/30/2008		Billable	0.00	T@12	
WIP		CBOND.N7551/19138	0.00		
Prepared motion for default judgment;			0.00		
Prepared notice of motion; Prepared					
certificate of service; Prepared exhibits;					
Prepared affidavit of attorney fees; Prepared					
draft order.					
357088	TIME	RJS	1.00		
4/30/2008		Billable	0.00	T@12	
WIP		CBOND.N7551/19138	0.00		
Prepared affidavit of Robert Lid in support of			0.00		
prove up. Prepared letter to Robert Lid					
regarding same.					
Grand Total					
		Billable	9.75		
		Unbillable	0.00		
		Total	9.75		

-2.75
7.00 @ \$165.00
\$1155.00